



□ 2517 Rt. 44, 11-222 Washington Hollow Plaza □ Salt Point, NY 12578 □

August 2, 2010

Federal Communications Commission
Chief, Wireline Competition Bureau
Sharon E. Gillett
445 12th Street, SW
Washington, DC 20554

sharon.gillett@fcc.gov
(202) 418-1500

Ms. Gillett,

The purpose of this letter is request that the FCC implement a fair rationing method for the release of the upcoming 855 area code in order to prevent hoarding by vanity number resposrgs, to help the actual end users looking to get these numbers, and to ensure the public image of the 855 area code is not tarnished. Releasing the 855 area code, now scheduled for October 2nd, without any restraint as the SMS/800 seems to be preparing to do, will cause irreparable harm to toll free subscribers, hurt the end user's choice and the opportunities within the industry.

I've been in the toll free industry since there was only "1-800" and I really love it. But the toll free world today is very different than it was a decade ago when the last new area code was added. That was before most of the current vanity number resposrgs came along, and vanity number resposrgs don't follow the same rules that traditional phone companies do. (See Appendix A) And if left unchecked they will almost certainly steal the bulk of the best numbers and prevent traditional phone companies and their customers from getting the numbers their customers are requesting.

Vanity number resposrgs have major advantages

Traditional phone companies try to help their customers get toll free numbers, but they don't get to keep the value of the numbers so they simply don't have that much incentive compared to the vanity number resposrgs that get to keep the value of the numbers for themselves. This means that vanity number resposrgs can afford far more connections and capacity than a regular phone company can possibly afford or justify.

Vanity number resposrgs also don't have to wait for customer requests, but can simply crunch the numbers and go after everything of any value. Regular phone companies have to wait for customers to request numbers, which gives them another major advantage. (See all 6 advantages explained more in Appendix A) Over the past decade the competition among vanity number resposrgs to get new numbers when they come out, has also developed to the point that even the largest regular phone companies can't beat the big vanity number resposrgs.

Evidence of number sucking

The best evidence of this aside from the overall industry growth areas, was the release last year of the 22 new '800' number exchanges converted from RCC numbers. Over 10,000 of the new numbers were taken by just one resposrg within just over one minute. Further evidence of this is how your own schedule for releasing 855 numbers was affected by a massive number grab in May by the same company. This one organization took over 400,000 numbers, dramatically affecting the exhaustion estimates.

That's why the SMS's June 6th estimate (right before you announced the 855 schedule) suggested there was only a 25 week supply left. Yet on July 10th, just five weeks later, after that spike in numbers passed, the SMS reported a 100 week supply remained. (See Appendix B) This along with the COO's comments illustrates how some vanity number resposrgs feel perfectly justified in taking almost half a million toll free numbers at once, even though several months later 98% of them are still unused by customers. (See Appendix C for more about this)

Irreparable harm

Releasing the 855 area code without any restraint will cause irreparable harm because most of these numbers taken by vanity number resposrgs will be out of circulation and unable to be used or acquired by the general public or end users. Once these 855 numbers are taken by these number sucking resposrgs, even those that remain available from that organization, will be much more expensive and there won't be any competition. There simply won't be any practical way to undo the damage and unassign them.

The solution is rationing

The simplest solution, is to just slow down the release and ration the initial 855 reservations. Slowing down the release a little would only harm someone trying to grab a huge amount of 855 numbers. It would allow traditional resposrgs without any exceptional high capacity a chance to get some numbers for their customers. There is a precedence for doing this to prevent hoarding, but this would be for a much shorter time period than ever before.

Slowing the release will benefit the SMS/800

The SMS/800 seems to be testing and preparing for a high volume of activity, but they don't have any incentive or desire to insure that they are released equitably or that they actually get into the hands of the public. The SMS is really only concerned with insuring that their system will sustain the onslaught of activity at the release. Rationing the 855 reservations will only help the release process, minimizing the land rush at the release. The only organization charged with insuring fairness and that the real end users have an opportunity to get them is the FCC.

End users will benefit

It's important to realize that **most of the customers looking for new toll free numbers are small or startup businesses who want to grow and help their business through creative advertising.** A good toll free number can make a significant difference to their small business for the life of their business. Vanity number resposrgs are the fastest growing area in the toll free industry and they hardly ever release numbers because they claim to be the owner of the number as well. *So allowing vanity number businesses to walk away with the lions share of the best 855 numbers will cause irreparable damage to the little guy that needs help the most but has nobody on his side.* It'll also cause irreparable damage to the overall market competitiveness, since these companies claim ownership and almost never release numbers.

Daily rationing is necessary

Monthly rationing would still allow vanity number resposrgs to suck up a large amount (their monthly ration) before regular phone companies had much chance to get anything. Monthly rationing would also hurt the regular phone companies more than the vanity number brokers, because regular phone companies wouldn't want to use up their entire ration on the first day (or first few minutes) like vanity number resposrgs would. The best solution would be daily rationing. Making the ration increment smaller only makes everyone take smaller plate fulls.

Imagine if the "all you can eat" buffet in your favorite restaurant had stacks of giant turkey sized platters, instead of regular sized plates. The people in the back of the line wouldn't get much to eat. But if everyone gets a small plate every day, the people at the front of the line still get first choice, but the numbers would get allocated and shared much more evenly. This insures that customers have choice and all phone companies have an opportunity to help their customers. Not just the ones that pay hundreds of thousands of dollars per month for 100+ times the connection capacity of regular phone companies. Rationing doesn't hurt anyone except potential hoarders. Rationing also costs absolutely nothing, especially compared to expensive legal action to prevent or enforce hoarding regulations after the fact. Can we afford not to?

Rationing should be by Resporrg Administrator not by Resporrg

Vanity number resposrgs have developed some very clever ways of hiding their activity not the least of which is setting up multiple resposrgs under different names. Some organizations have as many as six different resposrgs all with the same

administrator. One of the reasons they do this is to insure that they get multiple shares of numbers in case of rationing. These are technically separate resporgs, yet they are run essentially as one large organization.

The best solution is to apply a limit per resporg administrator, not per resporg. If multiple resporgs are controlled by one person they are really just one organization. In the buffet analogy I'm simply suggesting that nobody should be allowed to take six plate fulls at a time.

What should the daily limit be?

Very few resporgs ever activate 100,000 numbers in a single month. The average monthly new number acquisition for Sprint, for instance over the past two years has been 9,872 numbers and they've never activated more than 28,837 toll free numbers in a single month, in all toll free area codes. The most toll free numbers AT&T has ever activated in a single month in the past two years is 53,042, and the average is 28,249. That's why I would suggest that that you KISSs, Keep It Simple.

Each resporg administrator should be limited to one thousand 855 numbers per day for the first month. That is more per day than even AT&T typically activates in all four area codes combined. So that's clearly not a very restrictive limit. Another way to look at that is that if just 250 out of the 348 current resporg administrators each activated their limit of 855 numbers we would run out of 855 numbers in just 30 days. So this limitation can hardly be too much of a restriction. This limitation would only be for the first month and Resporgs could still activate as many of the other toll free area codes per day as they want.

"Temporary Anti-Hoarding Limit"

I would call this the "Temporary Anti Hoarding Limit", because that reinforces both the temporary nature of the limit and the fact that taking a huge amount of 855 instantly would at least look like potential hoarding. It also shows that you do care about the end user and your own regulations against hoarding. Calling it the Anti-Hoarding limit would make it hard to argue with, since no resporg is going to want to argue that they should be allowed to hoard.

This is a simple enough, short term limitation and would allow 855 numbers to be distributed more evenly and reach more of the actual end users. Nobody else in this process is trying to protect the end users. The SMS isn't, the vanity number resporgs certainly aren't, and even the traditional phone companies aren't. That responsibility ultimately falls solely to the FCC, and this is an easy way to show whether you're on the side of the consumer or not.

Even if there's just a small chance...

Even if there's just a small chance that a substantial amount of numbers will be taken by a handful of vanity number resporgs, and not be available to the end users that need them, can we afford to take that chance? If something as simple as putting a temporary cap on the volume of numbers, per organization, might help insure more of these numbers get into the hands of real end users that need them the most, how can we justify not doing this? If the limitation I'm suggesting seems too much, then compromise and do it for just the first two weeks instead of a month.

Toll free numbers are a valuable public resource, and all phone companies don't have equal access to it. Some companies pay for hundreds of times the capacity of other companies and they shouldn't be allowed to monopolize the public resource or suck it up and resell it for huge premiums. Just because some companies have the capacity to reserve 10,000 or more, numbers per minute doesn't mean they should be allowed to. This would dramatically reduce choice, opportunity and fairness and clearly hurt the entire toll free industry. Therefore I respectfully request that the FCC immediately direct the DSMI and in turn the SMS/800 to temporarily limit the amount of 855 numbers each resporg administrator can take each day, for the first month.

Very truly yours,

Bill Quimby
President of TollFreeNumbers.com

Appendix A

Vanity Number Companies play by different rules.



When Vanity Number businesses get access into the national 800 database (referred to as Resporgs) don't have the same business model as regular phone companies. They literally play by different rules. I've been in this business for 15 years and I'm going to share some of the biggest secrets of the vanity number business. This will make a lot of people very angry with me, but it's time to pull back the curtains in a few dark areas of this crazy little business.

1. Vanity Number Resporgs don't have to wait for Customer Requests.

Regular phone companies wait for customers to request numbers and then check to see if they're available. Vanity number resporgs not only don't have to wait for requests, but they look at what's coming out ahead of time and grab good numbers the same second they become available or in some cases even before they're available through the old phone company. So over time, vanity number companies get almost all of the good numbers coming out.

2. Vanity Number Resporgs get to keep the value of any numbers they get.

If a regular phone company does get a valuable number for a customer, the customer gets the value, not the phone company. And the same customer will switch to another company to save a penny per minute. Regular phone companies literally have no incentive to get good numbers for their customers. Vanity number companies have a huge incentive to get valuable numbers because they get to keep the value of their numbers.

3. Vanity Number Resporgs claim ownership of the numbers so they don't have portability.

Regular phone companies have to try to keep customers by doing a good job. Vanity number resporgs claim to be the end user in order to get around having to release numbers for the actual customer. They think the rules of portability simply don't apply to them. And don't think the scam of claiming a sister company technically owns them is anything other than a painting the pig a different color. It's still a pig whether it's pink or brown.

I'll show you the number of numbers released by the vanity number resporgs in a different article compared to the number of numbers released by regular phone companies. But believe me when I say that you can count the releases on one hand from a company with over a million '800' numbers, while regular phone companies release numbers all the time.

4. Vanity Number Resporgs claim to do "shared use" in order to get around regulations against hoarding and brokering numbers.

Vanity number companies often use "shared use" as an excuse to grab up thousands or tens of thousands of toll free numbers (or more!), and just wait for someone to them. Another word for that is hoarding, which is taking more numbers

use for. They don't have to have any customer requesting them because they just claim that they are the customer or a sister company is the "owner." Then they just sit on them waiting for someone to come along and want them. Most "shared use" companies have way more numbers than they have customers and only a small fraction of the numbers with a customer actually have more than one customers.

5. Vanity Number businesses charge much more than regular companies.

Regular phone companies charge a pretty minimal monthly fee of \$2 to \$10 per month, while Vanity Number businesses often charge \$100 per area code or market up to thousands of dollars per month for their numbers, even if they got the number out of the spare pool because the customer requested it, just like a regular phone company does. They just charge 100s of times as much.

Regular phone companies release numbers for free. They have to try to keep customers by doing a good job. Vanity number companies use shared use as an excuse to "[rent](#)" numbers. Some "shared use" companies also sell numbers by allowing customers to pay several years in advance (typically tens of thousands of dollars) in order to allow them to be transferred away. Otherwise, they claim ownership so the customer can't ever transfer the number away to another company, no matter how expensive the service becomes or how poor the service.

6. Vanity Number companies use their look up tools to trap customers.

Regular phone companies allow customers to check the availability of numbers on their website at no cost or obligation. They don't automatically [reserve](#) numbers that they find available so the customer has to get them from them. Most vanity number businesses that provide a look up tool which searches the national database, automatically reserve anything they find.

This is even worse when you consider that they also claim ownership of the numbers and don't release numbers or charge thousands of dollars to release the same number that the customer could have gotten for little or no cost if they didn't look it up on the vanity number respo's site. It's no wonder that most vanity number respo's put the look up tool prominently on the site and the details of their service buried. They want to get the benefit of customer's thinking they're a regular phone company in order to trap them. (Yes this point is specifically about CustomTollFree.com but it also relates to some others as well.)

Vanity number respo's combine the rights of phone companies with the rights of the end user in order to get around nearly all the regulations. They also try to look like regular phone companies to the public but don't pay taxes or follow any of the legal requirements of phone companies.

Full Disclosure: TollFreeNumbers.com falls some where in the middle on points 2 and 5. We do charge slightly more for some more valuable numbers, but our rates aren't based on the value of the numbers, trying to get as much as we can for the more valuable numbers. We charge a little more because we try harder and put in more resources than regular phone companies do to get good numbers for our customers. But that's not the same thing as keeping the full value of the numbers.

You could also say we charge more than a regular phone company, but that's only because regular phone companies don't charge anything for getting numbers. They use the profit of the ongoing service to cover the cost to set up numbers, and we don't sell them. We have to charge for that time and effort. Actually most of the enhanced v

charge a fee for a vanity number or for transferring a vanity number charge more than we do to get them, so we are clearly charging an appropriate fee for the service we provide.

As far as the other points, we do wait for customer requests for most numbers. We don't keep the real value of the numbers, we don't claim ownership of numbers, and we don't do shared use or pretend to be a regular phone company. We don't charge excessive fees and we're one of the few safe look up tools that doesn't trap anyone.

Laying this out for the world to see isn't going to win me any friends, for sure. This type of thing is the main reason a lot of people in the vanity number business trash talk me every chance they get. I don't hold out a lot of hope that anyone or anything is going to change very much, but I love this business and think that someone has to stand up and say these things for the good of the industry.

If you have any suggestions on how things could be changed, post it here. You can do it with or without your name so add your two cents!

Warning: Missing argument 1 for wp_pagenavi(), called in /var/www/wp-content/themes/tollfreenumbers/index.php on line 192 and defined in /var/www/wp-content/plugins/pagenavi/pagenavi.php on line 57

Appendix B

.Bill Quimby.

From: sms800@sms800.com
Sent: Monday, June 07, 2010 10:17 AM
To: SMS/800 Registered Users
Subject: CSB Notification: Standard Administration Reports NUM-10-23 - for Saturday, 6/5/2010 as of 11:59 PM, ET
Attachments: NUM-10-23.pdf

The Number Administration Summary Report for the week ending Saturday, June 5, 2010, shows a total of 3,373,987 numbers remaining in the spare pool. The quantity of numbers in use increased by 14,365. Please see CSB NUM-10-23 for full details.

If usage continues at the same level as the average growth rate for the last six (6) weeks, the estimated exhaust date for the current Toll Free number pool is as follows:

- (A) Total Spare Numbers = 3,373,987
- (B) Average Growth/Week = 133,961
- (C) Spare/Average Growth = 25 Weeks (estimated exhaust date of 11/27/10)

Please do not reply to this message as the mailbox does not accept incoming mail. If you do wish to reply to this message you may do so by using the Feedback feature on the SMS/800 Website (www.sms800.com) or by contacting the SMS/800 Help Desk at 1-888-SMS-3300, Option 1.

.Bill Quimby.

From: sms800@sms800.com
Sent: Monday, July 12, 2010 9:51 AM
To: SMS/800 Registered Users
Subject: CSB Notification: Standard Administration Reports NUM-10-28 - for Saturday, 7/10/2010 as of 11:59 PM, ET
Attachments: NUM-10-28.pdf

The Number Administration Summary Report for the week ending Saturday, July 10, 2010, shows a total of 3,196,111 numbers remaining in the spare pool. The quantity of numbers in use increased by 36,474. Please see CSB NUM-10-28 for full details.

If usage continues at the same level as the average growth rate for the last six (6) weeks, the estimated exhaust date for the current Toll Free number pool is as follows:

- (A) Total Spare Numbers = 3,196,111
- (B) Average Growth/Week = 32,040
- (C) Spare/Average Growth = 100 Weeks (estimated exhaust date of 06/02/12)

Please do not reply to this message as the mailbox does not accept incoming mail. If you do wish to reply to this message you may do so by using the Feedback feature on the SMS/800 Website (www.sms800.com) or by contacting the SMS/800 Help Desk at 1-888-SMS-3300, Option 1.

Appendix C

TollFreeNumbers.com

Toll Free Search Engine

Search using numbers, letters, or asterisks (*)

TollFreeNumbers Providers and Links

Request your 855 number
with your phone compay here

[Click for detail...](#)

Related Posts

- None

Toll Free Blog

- Potential Hoarding of Toll Free Numbers
- RespBorg
- Shared Use by a resporg = HOARDING
- Protecting your 800 Numbers
- Resporg ID Codes in the Toll Free Search Engine
- We want to get rid of our customers!
- Questions filling out resporg change forms
- Warning about using the Ameritech Resporg line
- 2 ways to transfer your 800 number to a call center
- Resporg Descriptions & Websites

Potential Hoarding of Toll Free Numbers

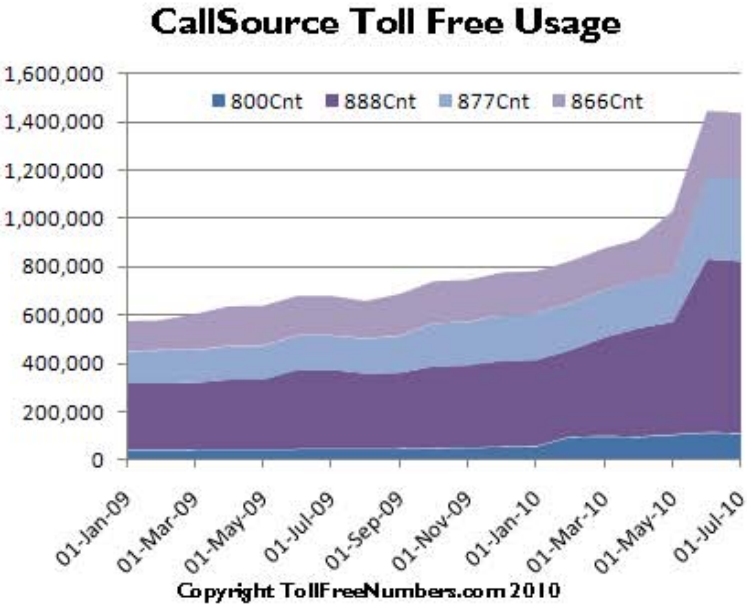
The FCC has regulations against hoarding and brokering. Hoarding is defined as taking more numbers from the Available pool than you have a legitimate business need for. Brokering is taking numbers from the Available pool for the purpose of reselling them. I've explained why I think the danger isn't abuse by end users but by phone companies. Plus toll free numbers are also invisible and have no physical presence so very few people ever see how many numbers each phone company has.

For various reasons, the FCC hasn't been overly aggressive in enforcing this type of abuse, combined with the inability of anyone to see or appreciate how many numbers different companies have, is enabling some companies to take advantage of the situation. I obviously can't do anything about the FCC, but I can make toll free numbers more visible, and expose just a little of the possible abuses of the system.

I don't do this to condemn anyone, but with 855 numbers coming out the danger of major abuse will be exponentially increased. In the mean time I'm going to show the volume of numbers activated and controlled by some companies. For instance, the fact that one company recently took over 400,000 numbers at one time, doesn't prove that they are hoarding or brokering numbers, but at some point it has to be at least a little suspicious. If you're wondering why we're running out of toll free numbers, take a look at the amount of numbers activated by CallSource.com. Over the past two years the volume of numbers available has decreased by about 3 million numbers, while at the same time CallSource alone, increased by almost 1 million numbers, (from half a million to one and a half million numbers!)



RSS Feed



Here's the actual monthly numbers.

DataDate	800Cnt	888Cnt	877Cnt	866Cnt
01-Jan-09	43932	274110	133621	123365
01-Feb-09	44177	275708	134267	123833
01-Mar-09	44515	276000	134718	149053
01-Apr-09	44972	288446	138569	164453
01-May-09	45344	289176	139738	164642
01-Jun-09	46281	328177	140522	164607
01-Jul-09	46687	328118	140829	164374
01-Aug-09	47052	312114	144102	155346
01-Sep-09	47964	313700	151205	174888
01-Oct-09	49758	339040	176823	174979
01-Nov-09	52393	340069	178754	174921
01-Dec-09	55508	356340	190435	175204
01-Jan-10	57720	357277	191946	175444
01-Feb-10	97831	358105	193092	175733
01-Mar-10	99926	408507	193886	175829
01-Apr-10	97806	448599	194168	176017
01-May-10	106066	466312	195263	266331
01-Jun-10	115371	716662	346143	272265
01-Jul-10	112828	709516	346705	272533

I understand that this isn't proof of hoarding, but there's certainly a lot of smoke here.

See also a previous article about Call Source sucking up over 10,000 out of the 22,000 "800" numbers released in April 2009 from RCC numbers! Watch out 855 numbers!

☆☆☆☆☆ (0 votes, average: 0 out of 5)

13 Comments »

Elliot Leiboff says:

July 20, 2010 at 2:39 pm | [Edit This](#)

Mr. Quimby,

I know you won't publish my response, just as you failed to publish my last one. Each time you raise this accusation of hoarding, I explain to you that CallSource is in the business of tracking telephone response to advertising.

We accomplish this by assigning a unique toll-free number to each ad campaign or marketing source our clients employ. We route these calls to our client's contact centers. We add further value by appending demographics to caller phone numbers, by recording client interactions with callers, by analyzing marketing and conversion efficiency and by training our clients to improve their call-handling skills.

We serve approximately 10,000 direct-response advertisers who run multiple ads and track more than 1,000,000 ads for well-known publications and online listing services- who use us to audit their lead-generation performance.

The reason we use an ever-increasing number of toll-frees is that our clients find our services valuable and our customer base continues to grow. The FCC does not have a problem with our business model, and neither should you.

Thank you.

Elliot Leiboff
Chief Operating Officer
CallSource

Bill Quimby (601 comments.) says:

July 20, 2010 at 4:56 pm | [Edit This](#)

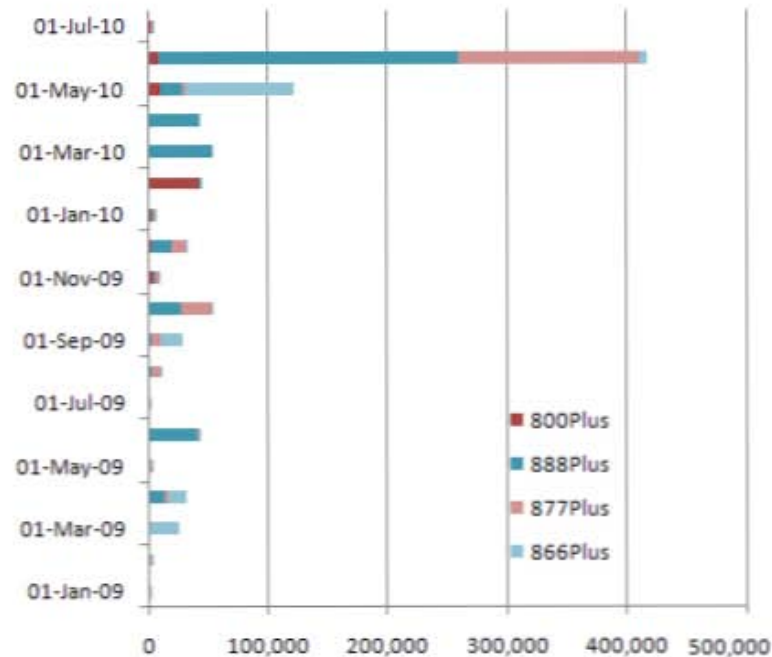
Mr. Leiboff,

I'm not blocking your comments. If you tried to reply before it was probably routed to spam. That's the only reason it wouldn't have been allowed. This message was sent to moderation, and I approved it verbatim without touching anything.

First of all, I'm not accusing you of hoarding. That would be a legal determination that the FCC would have to make. I'm not doing this because I'm trying to attack you or your organization either. I'm merely pointing out to the industry what's going on and trying to let a couple of the organizations that might be tempted to suck up large amounts of 855 numbers, know that what they're doing will be very visible.

About your claim that you NEED this many numbers in order to conduct your business, I would merely point out that there are multiple call tracking companies and NOBODY ELSE uses that many numbers for call tracking. If what you're doing was normal, all it would take to need a new area code is five companies that start doing call tracking like you do. There is a limited number of toll free numbers and if you can't run a call tracking business with the million numbers you had before you took the last 400,000 numbers, it doesn't take very much to figure out that you're probably doing something wrong.

You already had a million toll free numbers before you took the last 400,000 numbers in May. So by your own math, you just took 400,000 more numbers than you need. The pace that you're taking them also adds to the concern a little. It's hard to justify it as just your regular need, to server your customers when you grab so many numbers at a time that it makes the SMS stats look like there's only a couple weeks supply of numbers left. The following chart shows your monthly growth of numbers. It doesn't count the numbers that are dropped, but you don't drop all that much.



You can say that it's just your clients finding your service valuable, but why would your customer needs jump by 40% in a single month?! If you use the previous year's growth rate as a guide, 400,000 numbers would constitute more than a year's growth. So it's really not just your normal growth. But it's not me that you have to justify that to, it's the FCC. And fortunately they don't listen to me and probably won't ever read this. So you can claim you need that many numbers because you're such a great company, if you want to. I'm just pointing out how it looks and that it's possible to see how many numbers phone companies take each month.

Bill Quimby

Elliot Leiboff (3 comments.) says:

July 20, 2010 at 7:21 pm | [Edit This](#)

It took exactly 8 clients to utilize all 500,000 numbers reserved in May.

I'm sorry that you disapprove of our business model. Fortunately, our clients and the 200+ people we hired this year disagree with you.

Elliot

Bill Quimby (601 comments.) says:

July 20, 2010 at 8:33 pm | [Edit This](#)

Elliot,

Your claim that this massive amount of numbers is totally necessary just to service 8 customers only shows even more clearly that you're doing something wrong. Not to mention that you clearly weren't adding that many numbers before and your business obviously survived.

By that count if you got maybe 50 more customers you would need the entire, 855 area code. If that's not abusive to the system I don't know what is.

You don't have to justify that to me. But there should ultimately be some accounting for this somewhere in the system. Resporgs have a responsibility to utilize toll free numbers responsibly. And like my mother says, you have to avoid not only evil, but the appearance of evil. So even if you're not doing anything wrong you shouldn't do it in such a way that it looks like you're doing something wrong.

That was the point of the post. To warn vanity number resporgs (yourself included) not to do anything that looks suspicious, (like this!)

Bill Quimby

Elliot Leiboff says:

July 21, 2010 at 5:14 pm | [Edit This](#)

You are a real piece of work...

Bill Quimby (601 comments.) says:

July 21, 2010 at 5:34 pm | [Edit This](#)

Funny, that's exactly what I thought about you trying to justify half a million numbers as just your everyday normal customers needs...

Bill Quimby

Elliot Leiboff (3 comments.) says:

July 21, 2010 at 5:45 pm | [Edit This](#)

Tell me, Bill...

Why is it wrong for eBay Motors or Cars.com to deliver and track telephone leads for a few hundred thousand of their advertisers? How is your clients' use of toll-free numbers any more legitimate?

Elliot

Bill Quimby (601 comments.) says:

July 21, 2010 at 6:26 pm | [Edit This](#)

I thought about what you said and figured it wouldn't be hard to determine how many of the numbers are being used, as you claim.

I picked a few blocks of numbers pretty much at random, just knowing that there were more numbers available with 0s and 1s. I checked 1000 888 numbers and found 118 that were CallSource numbers. I called them and wrote down the response. I also noticed when I sorted them by date your "need" for the numbers became clear.

For older numbers, 18 out of 18 or 100% of the numbers are used

For numbers set up earlier this year, 4 out of 10 or 40% are in use.

For numbers acquired in May, 1 out of 90 numbers or 1% are in use.

This isn't scientific but it does raise some questions and seem to warrant more investigation. It reminds me of something else my mother said, "What you do screams so loud, that I can't hear what you're saying."

Like I said, I'm not doing this to give you a hard time, but just to let you know how this looks to the rest of the world and to remind you that the whole world can see what you're doing. It's easy to forget that in this often overlooked little corner of the world. I'm not drawing any conclusions and I didn't say anything was illegitimate. Hopefully this will just serve as a timely reminder for all the resporgs in the vanity number business.

8887010226 3/30/2000 Myer Motors
8887010281 3/30/2000 Holiday Automotive
8887010266 4/17/2001 Leasing information for unknown company
8887010224 4/12/2005 Lee Morehead
8887010229 4/12/2005 Enterprise Car Sales
8887010233 4/12/2005 Pauls Boat and RV
8887010235 4/12/2005 Connecticut Trailers
8887010238 4/12/2005 Somebody's Toyota and Psion
8887010239 4/12/2005 Bob Smith Motors
8887010240 4/12/2005 Palm Partners
8887010243 4/12/2005 Keyler Motor Car
8887010245 4/12/2005 Lou Offs Used Cars
8887010246 4/12/2005 The Monteray
8885010202 2/12/2008 Optimum Cable Co.
8885010404 2/12/2008 Evening Creek Apt. Homes
8883010209 7/21/2008 Crawley Chrysler Jeep Dodge
8888010243 3/17/2009 No longer in service.
8887010213 12/7/2009 Shamburg Auto Sales
For older numbers, 18 out of 18 or 100% of the numbers are used

8885010104 3/20/2010 Omaha Steaks answers
8885010106 3/20/2010 No longer in service.
8885010107 3/20/2010 No company, person answered
8885010108 3/20/2010 No longer in service.
8885010109 3/20/2010 No longer in service.

8885010120 3/20/2010 Recording wanting your name and message

8885010122 3/20/2010 Guardian - Medical alert service

8885010125 3/20/2010 No longer in service.

8885010126 3/20/2010 No longer in service.

8885010127 3/20/2010 No longer in service.

For numbers set up earlier this year, 4 out of 10 or 40% are in use.

8885010284 5/23/2010 No longer in service.

8885010294 5/23/2010 No longer in service.

8885010304 5/23/2010 No longer in service.

8885010314 5/23/2010 No longer in service.

8885010324 5/23/2010 No longer in service.

8885010334 5/23/2010 No longer in service.

8885010340 5/23/2010 No longer in service.

8885010341 5/23/2010 No longer in service.

8885010342 5/23/2010 No longer in service.

8885010343 5/23/2010 No longer in service.

8885010344 5/23/2010 No longer in service.

8885010345 5/23/2010 No longer in service.

8885010346 5/23/2010 No longer in service.

8885010347 5/23/2010 No longer in service.

8885010348 5/23/2010 No longer in service.

8885010349 5/23/2010 No longer in service.

8885010354 5/23/2010 No longer in service.

8885010364 5/23/2010 No longer in service.

8885010374 5/23/2010 No longer in service.

8885010384 5/23/2010 No longer in service.

8885010394 5/23/2010 No longer in service.

8885010401 5/23/2010 No longer in service.

8885010403 5/23/2010 No longer in service.

8885010405 5/23/2010 No longer in service.

8885010406 5/23/2010 No longer in service.

8885010407 5/23/2010 No longer in service.

8885010408 5/23/2010 No longer in service.

8885010409 5/23/2010 No longer in service.

8885010412 5/23/2010 No longer in service.

8885010413 5/23/2010 No longer in service.

8885010414 5/23/2010 No longer in service.

8885010416 5/23/2010 No longer in service.

8885010417 5/23/2010 No longer in service.

8885010418 5/23/2010 No longer in service.

8885010419 5/23/2010 No longer in service.

8885010420 5/23/2010 No longer in service.

8885010421 5/23/2010 No longer in service.

8885010422 5/23/2010 No longer in service.

8885010423 5/23/2010 No longer in service.

8885010424 5/23/2010 No longer in service.

8885010425 5/23/2010 No longer in service.

8885010426 5/23/2010 No longer in service.

8885010427 5/23/2010 No longer in service.

8885010428 5/23/2010 No longer in service.

8885010429 5/23/2010 No longer in service.

8885010431 5/23/2010 No longer in service.

8885010433 5/23/2010 No longer in service.

8885010434 5/23/2010 No longer in service.

8885010435 5/23/2010 No longer in service.

8885010436 5/23/2010 No longer in service.

8885010437 5/23/2010 No longer in service.

8885010438 5/24/2010 No longer in service.
8885010439 5/24/2010 No longer in service.
8885010440 5/24/2010 No longer in service.
8885010441 5/24/2010 No longer in service.
8885010442 5/24/2010 No longer in service.
8885010443 5/24/2010 No longer in service.
8885010445 5/24/2010 No longer in service.
8885010446 5/24/2010 No longer in service.
8885010447 5/24/2010 No longer in service.
8885010448 5/24/2010 No longer in service.
8885010449 5/24/2010 No longer in service.
8885010450 5/24/2010 No longer in service.
8885010451 5/24/2010 No longer in service.
8885010452 5/24/2010 No longer in service.
8885010453 5/24/2010 No longer in service.
8885010455 5/24/2010 No longer in service.
8885010456 5/24/2010 No longer in service.
8885010458 5/24/2010 No longer in service.
8885010459 5/24/2010 No longer in service.
8885010460 5/24/2010 Check your listing on Yellow.com
8885010461 5/24/2010 No longer in service.
8885010462 5/24/2010 No longer in service.
8885010463 5/24/2010 No longer in service.
8885010464 5/24/2010 No longer in service.
8885010465 5/24/2010 No longer in service.
8885010477 5/24/2010 No longer in service.
8885010481 5/24/2010 No longer in service.
8885010482 5/24/2010 No longer in service.
8885010483 5/24/2010 No longer in service.
8885010484 5/24/2010 No longer in service.
8885010485 5/24/2010 No longer in service.
8885010486 5/24/2010 No longer in service.
8885010487 5/24/2010 No longer in service.
8885010488 5/24/2010 No longer in service.
8885010490 5/24/2010 No longer in service.
8885010491 5/24/2010 No longer in service.
8885010492 5/24/2010 No longer in service.
8885010493 5/24/2010 No longer in service.
8885010494 5/24/2010 No longer in service.

For numbers acquired in May, 1 out of 90 numbers or 1% are in use.

Bud says:

July 22, 2010 at 10:31 am | [Edit This](#)

Wow, Checkmate! This was a little long but Bill, you're right on. It's what they do that counts, not what they say.

Elliot Leiboff (3 comments.) says:

July 22, 2010 at 10:38 am | [Edit This](#)

I don't suppose you remembered from our earlier exchange that, in order to assure accurate call counts, we hold newly reserved numbers for 90 days before assigning them, in order to filter out those with wrong-number traffic.

Bill Quimby (601 comments.) says:

July 22, 2010 at 4:33 pm | [Edit This](#)

Great, I'll do a follow up with you in a couple months, maybe after the 855 numbers are released. You won't have to do an aging process on them!

I'm also not sure what exchange you're referring to, but admitting that you're not using any of the half a million numbers you took, probably doesn't help your case a whole lot. The regulation against hoarding don't say it's alright to hoard for just a little while.

Besides, you know that they had to be in disconnect for four months before they could be returned to the spare pool. Most of them haven't been used in several months on top of that. And half the misdials come from dialing wrong, not from past or out of date advertising. So that may sound smart on the surface, but again, it's just an excuse, and not a very solid one at that.

Bill Quimby

PS. Please talk to your legal department before responding any more, because you just keep digging yourself in even deeper here! The point of this article wasn't to prove that you're hoarding. But the more you keep making excuses, the worse it's making you look.

I keep telling you that the point is just to remind you and anyone else that will be tempted to grab large amounts of 855 numbers, how this type of thing looks and how visible it ultimately is. I guess the secondary point is now, that "excuses" are just that and don't give you the right to do anything you want.

Bill Quimby (601 comments.) says:

July 22, 2010 at 5:13 pm | [Edit This](#)

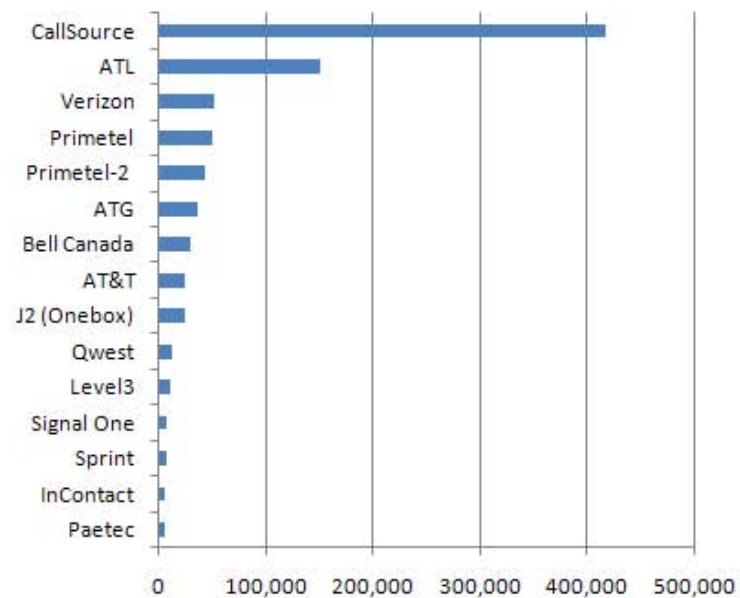
I think this post dovetails with another post from just a couple days earlier about how if I go out of business I'll go work as a consultant for the FCC. <http://www.tollfreenumbers.com/blogs/about-us/fcc-consultant.html>



Bill Quimby (601 comments.) says:

July 23, 2010 at 3:09 pm | [Edit This](#)

There's one more piece of data missing from this that I thought might be helpful to add. It's a comparison of the amount of numbers that other companies took. If this was just their normal customer's needs how much did customers ask for at other companies?



We could go into this same type of detail with any resporg but this is illustrative enough for this conversation.

Bill Quimby

1 ping

Shared Use by a resporg = HOARDING at TollFreeNumbers.

com says:

July 28, 2010 at 8:02 pm | [Edit This](#)

[...] Free Blog Potential Hoarding of Toll Free NumbersRespBorgShared Use by a resporg = HOARDINGProtecting your 800 NumbersResporg ID Codes in the Toll [...]

[RSS feed for comments on this post.](#) [TrackBack URL](#)

Leave a comment

Logged in as [Bill Quimby](#). [Logout](#) »

Random Testimonials

Testimonial 1786 out of 1963

Your website is so easy to use that I thought "Hey that can't be all it takes to

